

### **III. REMARKS**

#### **Status of the Claims**

Claims 10-26 are presented for reconsideration.

#### **Summary of the Office Action**

Claims 10-13 and 16-26 stand rejected under 35USC102(e) on the basis of the cited reference Aoki, U.S. Patent No. 5,438,359. Claims 14-15 stand rejected under 35USC103(a) based on the cited reference Aoki in view of the teaching of Parulski et al, U.S. Patent No. 5,475,441. The Examiner is respectfully requested to reconsider his rejection in view of the following remarks.

#### **Discussion of the Cited Reference**

The Examiner relies on the cited reference Aoki as primary support for the rejections based on anticipation and obviousness. The reference Aoki is characterized by the Examiner as follows:

**"As to claim 10, Aoki teaches that a circuit card (Fig. 1, items 1,3), which can be fitted to a card slot (Fig. 1, item 23, col. 2 lines 65-68)"**

This statement is not supported by the cited reference. Aoki describes a camera system in which a pocket sized camera 1 is used with a portable computer 2. The computer body is constructed with a recess 23 that is constructed to accommodate the camera. The camera is inserted into the recess for connection to the computer. The camera includes an IC memory card 3 which is inserted into a card opening 102 for connection through a first connector 104. The camera 1 is connected to the computer 2 through a second connector 105.

The circuit card (3) to which the Examiner refers is the flash memory of the camera 1. It does not include optics as indicated by the Examiner, but only memory.

The camera 1 of Aoki is not a circuit card and the recess 23 is not a card slot. The camera 1 has a case which is inserted into a special recess the dimensions of which are designed to accommodate the case. This could be more correctly described as docking station, certainly not a card slot.

In the subject invention the elements of a camera function are integrated into the circuit card itself. The circuit card can be inserted into a conventional card slot used in personal computers. Aoki does not teach the circuit card of this application.

The Examiner is reminded that the anticipation analysis requires a positive answer to the question of whether the system of Aoki would infringe the claims of this application if it were later.

All of the claims of this application are directed to a circuit card having camera elements integrated therein to provide a camera function.

Since there is no circuit card in the camera system of the reference Aoki, there can be no infringement of the subject claims. Therefore the teaching of Aoki does not support the rejection based on anticipation with respect to any of the claims.

The Examiner has further cited the reference Parulski in support of the rejection of claims 14 and 15 based on obviousness. In

the citation of Parulski, the Examiner characterizes the extender board 24 of Parulski as having:

"...optics built in said circuit card ... an image sensor in said circuit card...an image processing unit in said circuit card... a memory unit in said circuit card ... and a processor unit in said image processing unit..."

As previously stated, the cited reference Parulski does not support the above description. The extender board 24 is not a circuit card. It is merely a conduit for connecting camera 20 to portable computer 10. It is also referred to as "structural element 22". Extender board 24 fits into a PCMCIA card slot. In addition, it may be removable from camera 20. The circuit card of this invention integrates the elements of a camera function into the circuit card itself. (see column 3, lines 52-63) This is not taught by the cited reference Parulski.

The cited reference describes an electronic camera system for operation with a computer. The basic idea of Parulski is that they have an adapter, (i.e. card interface/extender board/structural element 24) between the camera and the computer for transferring (image) signals to the computer. The camera can be connected to the adaptor directly with a mechanical connection or by cable (fig. 6) or by radio with RF transmitter and a receiver (fig. 7).

Because of the above described differences in the device of Parulski, the cited reference does not remedy the deficiencies of the reference Aoki

It is well settled that in order to establish a prima facie case for obviousness, the prior art reference (or references when

combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, without reference to the disclosure of this application.

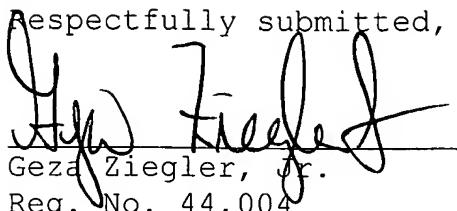
Applicant submits that the above described deficiencies of the primary reference Aoki are not remedied by the proposed combination with the teaching of the reference Parulski. The combined references do not therefore support a prima-facie case of obviousness. The modification of the teachings of Aoki or Parulski, in order to obtain the invention, as described in the claims submitted herein, would not have been obvious to one skilled in the art.

The above arguments apply equally to the rejected dependent claims.

For all of the above reasons, it is respectfully submitted that all of the claims, now present in the application, are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

A check in the amount of \$1020.00 is enclosed for a three-month extension of time. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
Geza Ziegler, Jr.

Reg. No. 44,004



26 Jan 2004

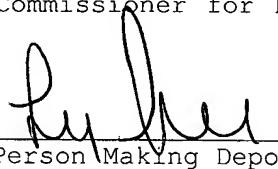
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